

EXHIBIT G

1 drivers, so when I came back to couple trucks, then I put
2 DBA instead of LLC or Corporation. I was paying too much.

3 Q. So the cor -- the entity is actually Kuwar Singh
4 doing business as RT --

5 A. Service.

6 Q. Service?

7 A. Yes.

8 Q. And you're saying that -- are you saying that was a
9 sole proprietorship?

10 A. Yes.

11 Q. Versus a LLC?

12 A. Yeah.

13 Q. Has your father ever driven truck?

14 A. No.

15 Q. Does he have a commercial driver's license?

16 A. No.

17 Q. Did you name the company in his name just like as an
18 honor to him?

19 A. Yeah.

20 Q. Does he have anything to do with the business of
21 Kuwar Singh doing business as RT Services?

22 A. No, he was helping me out.

23 Q. Helping you out how?

24 A. Cleaning trucks. Washing trucks. We were working

1 together. I just wanted to have the name under him as my
2 dad.

3 Q. Did he do any of the administrative work like talk
4 to the brokers to get runs or anything like that?

5 A. No, he doesn't speak English.

6 Q. And then moving forward, was there a point that you
7 stopped operating under Rheas Transportation and then were
8 only operating under Kuwar Singh doing business as RT
9 Service?

10 A. Right.

11 Q. So I think you told me, I just want to get my mind
12 on it. When did the -- about what year was the switch from
13 R --

14 A. '14, '15 something like that.

15 Q. Was there a time when there was an overlap that you
16 were sometimes using one and sometimes the other?

17 A. No.

18 Q. Just when you stopped at Rheas --

19 A. Rheas Trans and waited again for RT Service.

20 Q. Then RT Service operated through '14, '15, '16?

21 A. Yeah, I'll say a good two years.

22 Q. Did RT Service continue to -- did it take any loads
23 after this crash we're here about today?

24 A. I am sorry?

1 A. Yeah. I look at the brakes everything was good, no
2 air leak nothing.

3 Q. When you -- then you go home and then you come back,
4 do you remember how early you would have picked up the
5 truck? I'm just wondering how you had time to go back home
6 unless you picked it up like early in the morning?

7 A. Yeah, I think I picked it up early in morning some
8 where there. Yeah, I dropped the kids to school and then
9 went to pick them up, something like that.

10 Q. So if the payment time is 3:30, you can pick it up
11 at 10:00 A.M. and it's still --

12 A. You can call and if the load is ready, you can pick
13 it up whatever.

14 Q. And you believe that's what you did?

15 A. Yeah, that's what I did.

16 Q. And then you went back, let's say around 3:00 to
17 take the truck on the road, did you do the pre-trip again
18 or did the first pre-trip kind of cover that?

19 A. No, I did it again.

20 Q. You did a whole 'nother pre-trip?

21 A. Another pre-trip.

22 Q. And once again the brakes are within limits?

23 A. Yes.

24 Q. Including the drive axle?

1 the right lane?

2 A. Yes.

3 Q. Around 60 to 64 miles per hour?

4 A. Yes. Speed limit still say 75.

5 Q. Now at some point -- oh, some point the speed limit
6 goes to 65 beyond where the crash happened; is that right?

7 A. As soon as you pass Elko, it's 75 miles per hour.

8 So I was past Elko and the -- the speed limit still say 75.

9 Q. You had said something earlier about the speed limit
10 going to 65?

11 A. Right in Elko City it goes to 65, as soon as you
12 pass Elko, it goes to 75.

13 Q. Had you already passed Elko?

14 A. I already passed Elko.

15 Q. So you went through Elko, did you -- what speed were
16 you driving when you went through Elko in the 65 mile per
17 hour zone?

18 A. 60.

19 Q. You went 60. And then when you got to the 75 miles
20 per hour zone, you stay the same or more than 64?

21 A. Right at same amount because I never go 75, I can't
22 go 75. It happened right after that city.

23 Q. When the roads are dry, if you were taking this run
24 today -- things are pretty -- taking it on dry, clear, day,

1 pulling to the right side of the road.

2 Q. So you take your foot off the accelerator or the
3 pedal I should say and then you look in your right mirror?

4 A. Yeah.

5 Q. And you see your trailer?

6 A. Yeah, between that time as soon as I spin, I went
7 forward and my trailer tires came to the same black ice,
8 and I look to my right, my trailer -- I am on the right
9 lane and I see the mirror my trailer light -- my trailer's
10 going off the road, like on the shoulder.

11 Q. As you're driving -- you learned when you went to
12 truck driving school an idea of always have an out; is that
13 right?

14 A. What is it?

15 Q. Did you ever learn the idea of always have an escape
16 in your mind as you're driving?

17 A. Yes.

18 Q. So as you're driving in the right lane on I-80
19 eastbound before the third differential light lit up, did
20 you ever have in mind what your escape route would be if
21 you were faced with an emergency?

22 A. Yeah.

23 Q. What was your escape route?

24 A. Yes.

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 ALLEN M. MILLER,)

)

4 Plaintiff,)

)

5 vs.)

Case No.

6 3:17-cv-00408-MMD-WCG)

7 C.H. ROBINSON WORLDWIDE,)

)

8 INC., RONEL R. SINGH,)

RHEAS TRANS INC., AND)

VOLUME II

9 KUWAR SINGH D/B/A RT)

)

SERVICE)

)

10 Defendants.)

)

11 - - -

12
13
14 CONTINUED VIDEO RECORDED DEPOSITION OF RONEL R. SINGH
VOLUME II

15 (Pages 253 through 419)

16
17 DATE: February 17, 2018, at 9:16 a.m.18 PLACE: Huseby, Inc.
19 555 Capital Mall
Suite 550
20 Sacramento, California 9581421 REPORTER: LaCreisha Vaughn
CSR 13945

22 - - -

1 Q. So you're driving at what speed before your vehicle
2 goes into the median?

3 A. 60, 65.

4 Q. And before you go into the median, you never apply
5 your brakes?

6 A. No.

7 Q. Why didn't you apply your brakes?

8 A. I didn't have time. By the time I -- about -- I
9 mean I was thinking something, I was already in the middle.

10 Q. Okay. What caused your vehicle to go into the
11 median?

12 A. No steer. I couldn't steer or anything. It was
13 ice. Black ice.

14 Q. So you're driving -- I'll just say some number
15 around -- what speed do you think you were going?

16 A. 60 to 65.

17 Q. Okay. We'll use that as your estimate. You're
18 going about 60 to 65 miles an hour, what was your first
19 sensation that you have a problem?

20 A. When I was in the right lane the whole truck start
21 skidding to the left side -- I mean to the right side.

22 Q. So the right lane would be the slow lane; correct?

23 A. Correct.

24 Q. Were you in that lane of travel?

1 Q. Okay. You don't receive anything else from C.H.
2 Robinson, do you?

3 A. No.

4 Q. In other words, they say if you successfully pick up
5 the load and deliver it, you get this amount of money, but
6 everything else is on you; is that accurate?

7 A. Right. So sometimes they give you fuel.

8 Q. When does that occur?

9 A. When you pick up a load, they give you T-Chek or --
10 yeah, T-Cheks.

11 Q. Have you ever filled out an application to work for
12 any logistic companies to do any sort of work with them in
13 the last two years?

14 A. I don't understand.

15 Q. Okay. You told me that Coyote, Landstar, TQL and
16 C.H. Robinson, they require you to fill out a contract;
17 correct?

18 A. Correct.

19 Q. And you now have this new company called RTS
20 Transport; correct?

21 A. Yes.

22 Q. So did RTS Transport have to sign a contract with
23 any of these logistic companies that it's doing business
24 with?

1 mobile communication"? Do you know what that is?

2 A. Yes.

3 Q. Do you have MacroPoint mobile communication?

4 A. Yes.

5 Q. Tell me your understanding as to how it works from
6 your point of view?

7 A. So as soon as you pick up the load and you call C.H.
8 Robinson that you picked up the load on time, everything is
9 good, and you're going to be delivering on time and they
10 put microphone on your phone, so they can see where you at.

11 Q. From the time you picked up the shipment in
12 Sacramento until the accident, had you had any
13 communication with anybody from C.H. Robinson?

14 A. Yes.

15 Q. When?

16 A. Getting a T-Chek fuel.

17 Q. Okay. That's after the accident; right?

18 A. Before.

19 Q. So how about you pick up the load, you're in
20 Sacramento; right?

21 A. Right.

22 Q. From the point you pick up the load are you on your
23 CB radio or telephone or transmitting any communication
24 with C.H. Robinson?

1 saying you have to agree, but if there's something you know
2 about it that you disagree with, I'm going to ask you. So
3 on the Cause Analysis it says "Environmental Factors. The
4 roadway was completely covered in ice/snow." Is that
5 accurate?

6 A. Yes.

7 Q. This officer writes "Speed too fast for the
8 conditions was a factor for both drivers." Do you believe
9 that's accurate?

10 MR. ZANIEL: Objection. Form.

11 BY MR. SULLIVAN:

12 Q. Do you believe that's accurate?

13 A. No.

14 Q. And why do you believe that? You think your speed
15 was appropriate?

16 A. Yes.

17 Q. So knowing everything about your speed today, you
18 would have driven about the speed?

19 A. No, at least 70 or 68 more if it was clear road.

20 Q. No. I'm talking about today. Knowing everything
21 you know if it was the same conditions today, would you
22 still drive at the same rate of speed?

23 A. No.

24 Q. You'd drive slower?

1 A. Maybe, yeah.

2 Q. Under -- according to this report under "Mechanical
3 Factors," you have "Vehicle 1," that's the 2004 Volvo
4 tracker, and "Trailer 1," which is the Great Dane box
5 trailer. Do you see that?

6 A. Yes.

7 Q. It says, "During the investigation no evidence
8 suggested a mechanical failure on the part of vehicle --
9 or trailer No. 1." You see that?

10 A. Yes.

11 Q. Do you agree with that?

12 A. Yes.

13 Q. Also for this report, Mechanical Factors Vehicle No.
14 2, the Chevy pickup this officer writes "During the
15 investigation no evidence suggested a mechanical failure."
16 Do you have any reason to disagree with that?

17 MR. ZANIEL: Objection to form.

18 BY MR. SULLIVAN:

19 Q. Do you know of anything that was wrong with the
20 plaintiff's pickup truck? Like, if you seen anything like
21 his brakes were bad?

22 A. No, nothing.

23 Q. You don't have any evidence that he had had any
24 drugs or alcohol in his body; right?

1 correct?

2 A. Yes.

3 Q. And you would have also had any text messages about
4 the accident, like, to your wife or anybody at C.H.
5 Robinson?

6 A. Maybe.

7 Q. Then you wrote -- why don't you just read into the
8 record slowly what you wrote?

9 A. "I was coming eastbound 80 on 55 miles per hour."

10 Q. Okay. Let's stop right there. What does that mean,
11 "on 55 miles per hour"?

12 A. That I was going about 55 miles per hour.

13 Q. Okay. And is that what you think you were going or
14 did you think you were going 65 miles an hour?

15 A. I think 55 to 60.

16 Q. Okay. Keep reading?

17 A. "All I seen was my trailer started going to the
18 right side to black ice and my truck went to the left side.
19 I hear some other car hit me and I was still inside the
20 truck."

21 Q. And when you're writing "I hear some other car hit
22 me," that you believe is actually the plaintiff's truck
23 that hit you?

24 A. Yeah.

1 THE WITNESS: Okay. Sorry, go again.

2 BY MR. LEIZERMAN:

3 Q. In if you had been driving 45 miles per hour that
4 night, to the best you believe, would your truck still slid
5 off the road or no?

6 A. No.

7 Q. At 45 miles per hour your belief is that your truck
8 would not have slid off the road; is that correct?

9 A. Yeah.

10 Q. You know from your -- this was what you call a light
11 load; correct?

12 A. Yes.

13 Q. It was between 13- and 14,000 pounds; correct?

14 A. Or less than that, yeah.

15 Q. When you have a light load, it makes your truck more
16 difficult to stop; correct?

17 A. No.

18 Q. Did anyone at C.H. Robinson ever tell you with a
19 light load it makes your truck more difficult to stop?

20 A. No.

21 Q. Did you learn in your commercial driver's license
22 training that an empty trailer or a light load are more
23 difficult to stop?

24 A. Yes.

1 A. No.

2 Q. And you're understanding of the MacroPoint app is so
3 that C.H. Robinson can know where the load is at all times;
4 is that correct?

5 A. Yes.

6 Q. Speaking of iPhones, how many cell phones did you
7 have with you in the truck at the time of the crash?

8 A. Just one.

9 Q. That was your iPhone 6 that you gave us the phone
10 number for before; correct?

11 A. Yes.

12 Q. And just to be very clear, were there any other cell
13 phones provided by C.H. Robinson, RT Service, your wife,
14 anybody else even if you didn't use it as a cell phone,
15 maybe use it for another purpose, any other cell phone in
16 the truck at the time?

17 A. No.

18 Q. How about a tablet like an iPad or other tablet?

19 A. No.

20 Q. Any satellite communication device, like, a Qualcomm
21 unit or otherwise?

22 A. No.

23 Q. A radar detector?

24 A. No.